

UNITED STATES DISTRICT COURT

for the

District of Massachusetts

United States of America

v.

Peter Brand, Jie "Jack" Zhao

Defendant(s)

Case No.

20-mj-7366-JCB

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of 2012-2017 in the county of Norfolk, Middlesex in the
 District of Massachusetts, the defendant(s) violated:

Code Section

18 U.S.C. sec. 371

Offense Description

Conspiracy to Commit Federal Programs Bribery

This criminal complaint is based on these facts:

See Affidavit of IRS Special Agent Elizabeth Keating

☒ Continued on the attached sheet.*Elizabeth Keating**Complainant's signature*

IRS Special Agent Elizabeth Keating

Printed name and title

Sworn to telephonically in accordance with Fed. R. Crim. P. 4.1.

Date: 11/13/2020City and state: Boston, Massachusetts*Jennifer C. Boal**Judge's signature*

Hon. Jennifer C. Boal, U.S.M.J.

Printed name and title